

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SANDRA GUZMAN,

Plaintiff,

v.

NEWS CORPORATION, NYP HOLDINGS, INC.,  
d/b/a THE NEW YORK POST, and COL ALLAN,  
in their official and individual capacities,

Defendants.  
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: No. 09 Cv. 9832 (LGS)  
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**DECLARATION**

Lawrence M. Pearson, for his declaration pursuant to 28 U.S.C. §1746, states:

1. I am a member of the bar of this Court and a Senior Associate at Thompson Wigdor LLP, attorneys for Plaintiff Sandra Guzman. As such, I am fully familiar with the matters set forth herein, and make this declaration in support of Plaintiff's opposition to Defendants NYP Holdings, Inc., d/b/a The New York Post and Col Allan's Motion for Summary Judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.

2. Attached hereto as **Exhibit 1** are true and correct copies of excerpts of the deposition of Sandra Guzman dated October 13, 2011 and February 13, 2012.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a document Bates-stamped NYP 0506-0512 produced by Defendants in this action.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a document Bates-stamped SG 6951-6952 produced by Plaintiff in this action.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a document Bates-stamped NYP 4212-4214 produced by Defendants in this action.

6. Attached hereto as **Exhibit 5** is a true and correct copy of a document Bates-stamped NYP 0638 produced by Defendants in this action.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a document Bates-stamped NYP 0301 produced by Defendants in this action.

8. Attached hereto as **Exhibit 7** are true and correct copies of excerpts of the deposition of Joe Robinowitz dated June 14, 2012.

9. Attached hereto as **Exhibit 8** is a true and correct copy of a document Bates-stamped SG 0079 produced by Plaintiff in this action.

10. Attached hereto as **Exhibit 9** is a true and correct copy of a document Bates-stamped SG 1062 produced by Plaintiff in this action.

11. Attached hereto as **Exhibit 10** is a true and correct copy of a document Bates-stamped SG 6785 produced by Plaintiff in this action.

12. Attached hereto as **Exhibit 11** are true and correct copies of excerpts of the deposition of Les Goodstein dated June 15, 2012.

13. Attached hereto as **Exhibit 12** is a true and correct copy of an Affidavit of Sandra Guzman dated July 19, 2010.

14. Attached hereto as **Exhibit 13** is a true and correct copy of a document Bates-stamped SG 2343 produced by Plaintiff in this action.

15. Attached hereto as **Exhibit 14** are true and correct copies of excerpts of the deposition of Ebony Clark dated May 30, 2012.

16. Attached hereto as **Exhibit 15** are true and correct copies of excerpts of the deposition of Col Allan dated February 14, 2012 and February 21, 2013.

17. Attached hereto as **Exhibit 16** are true and correct copies of excerpts of the deposition of Mary McLoughlin dated April 30, 2012.

18. Attached hereto as **Exhibit 17** is a true and correct copy of a document Bates-stamped SG 0165 produced by Plaintiff in this action.

19. Attached hereto as **Exhibit 18** are true and correct copies of excerpts of the deposition of Jesse Angelo dated April 25, 2012.

20. Attached hereto as **Exhibit 19** are true and correct copies of excerpts of the deposition of Jennifer Jehn dated June 26, 2012 and February 14, 2013.

21. Attached hereto as **Exhibit 20** is a true and correct copy of a document Bates-stamped NYP 1818-1819 produced by Defendants in this action.

22. Attached hereto as **Exhibit 21** are true and correct copies of documents Bates-stamped NYP 489-490 and NYP579 produced by Defendants in this action.

23. Attached hereto as **Exhibit 22** is a true and correct copy of a document Bates-stamped NYP 2067-2068 produced by Defendants in this action.

24. Attached hereto as **Exhibit 23** is a true and correct copy of a document Bates-stamped SG 6962 produced by Plaintiff in this action.

25. Attached hereto as **Exhibit 24** is a true and correct copy of a document Bates-stamped NYP 0488 produced by Defendants in this action.

26. Attached hereto as **Exhibit 25** is a true and correct copy of a document Bates-stamped SG 6963 produced by Plaintiff in this action.

27. Attached hereto as **Exhibit 26** is a true and correct copy of excerpts of the deposition of Paul Carlucci dated June 22, 2012.

28. Attached hereto as **Exhibit 27** is a true and correct copy of an Affidavit of Sheri Logan dated November 6, 2009.

29. Attached hereto as **Exhibit 28** is a true and correct copy of an Affidavit of Ebony Clark dated October 21, 2009.

30. Attached hereto as **Exhibit 29** is a true and correct copy of a document Bates-stamped NYP-FL000147 produced by Defendants a related action.

Dated: May 24, 2013  
New York, New York

A handwritten signature in black ink, appearing to read 'Lawrence M. Pearson', written over a horizontal line.

Lawrence M. Pearson